| 1 2 3 4 5 6 7 8 9 10 11 12 13 | 75 E. Santa Clara Street, Suite 1150 San Jose, CA 95113-1837 Telephone: (408) 715 7980 Facsimile: (408) 715 7001 Jingjing Ye (Admitted Pro Hac Vice) Email: yelaw@pm.me | Constantine P. Economides (pro hac vice) (Florida Bar No. 118177) Brianna Pierce (CA Bar No. 336906) ROCHE FREEDMAN LLP 1 SE 3rd Avenue, Suite 1240 Miami, FL 33131 Tel: (305) 971-5943 Email: ceconomides@rochefreedman.com bpierce@rochefreedman.com Attorneys for Plaintiff Ariel Abittan |
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| | ARIEL ABITTAN, | Case No.: 5:20-CV-09340-NC |
| 20 | Plaintiff, | DECLARATION OF CRAIG A. HANSEN IN SUPPORT OF STIPULATION RE |
| 21 | v. | CONTINUANCE OF CASE |
| 22 | LILY CHAO (a/k/a TIFFANY CHEN, a/k/a | MANAGEMENT CONFERENCE [PROPOSED] ORDER |
| 23 | YUTING CHEN), DAMIEN DING (a/k/a DAMON LEUNG, a/k/a DAMIEN RAY | |
| 24 | DONOVAN, a/k/a TAO DING), YUTING CHEN, TEMUJIN LABS INC. (a Cayman | Judge: Hon. Nathanael M. Cousins |
| 25 | Islands corporation), and Does 1-100, inclusive, | |
| 26 | Defendants. | |
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I, Craig A. Hansen, hereby declare:

- I am an attorney admitted to practice before this Court and an attorney at the law firm of Hansen Law Firm, P.C. ("HLF"), which represents Defendants Temujin Labs Inc., a Cayman Islands corporation ("Temujin Cayman") and the Individual Defendants (collectively "Defendants"). I have personal knowledge of the matters set forth in this declaration and, if called upon to do so, could and would testify competently as to the matters described below.
- 2. I am currently scheduled to be in trial on another matter in Santa Clara County Superior Court on August 24, 2022, the same date the Case Management Conference is set for in this matter.
- 3. HLF and counsel for Plaintiff have met and conferred and agreed: (1) to continue the Case Management Conference from August 24, 2022 at 10:00 a.m. to September 7, 2022 at 1:00 p.m., and (2) that the joint case management conference statement would be due by August 31, 2022.
- 4. I do not believe that the requested time modification would have a prejudicial effect on the schedule for the case. Trial has not been set in the case, and no discovery has been conducted yet (the depositions of the Individual Defendants were stayed pursuant to the Court's order on May 2, 2022, Dkt. No. 139).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of July, at San Jose, California.

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